

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

JERRY W. and GOLDA M. WASHINGTON,
individually and on behalf of all those
similarly situated,

Plaintiffs,

v.

COUNTRYWIDE HOME LOANS, INC.,

Defendant.

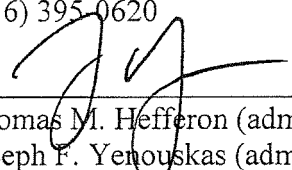
No. 08-00459-CV-W-FJG

DEFENDANT COUNTRYWIDE HOME LOANS, INC.'S FIRST PRIVILEGE LOG

Defendant Countrywide Home Loans, Inc. ("Countrywide") submits this First Privilege Log with respect to Plaintiffs First Set of Interrogatories and First Request for Production of Documents (the "Discovery"). Countrywide reserves all objections with respect to the Discovery and in providing this Privilege Log, Countrywide does not concede that any document logged is relevant to this litigation. This Privilege Log identifies privileged documents that Countrywide has located to date, and Countrywide reserves the right to supplement this Privilege Log if it locates additional responsive documents. If the Court orders production of any specific documents on the Privilege Log, Countrywide reserves the right to redact irrelevant material from such documents.

Countrywide has logged, as items 2 and 3, groups of general documents and communications protected by the attorney-client privilege and work product doctrine. It would be overly-burdensome for Countrywide to identify and log separately each such document and communication.

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Counsel for Defendant
Countrywide Home Loans, Inc.

Dated: August 28, 2008

	Document Date	Author	Recipient	Privilege	Description
1	Undated	Countrywide's Production Quality & Compliance Department		Attorney-client privilege	Communication regarding permissible fees for Missouri second loans
2				Attorney-client privilege Attorney work product	Numerous attorney client communications between attorneys for Countrywide and Countrywide employees and work product of Countrywide attorneys.
3				Attorney-client privilege Attorney work product	Numerous attorney client communications between attorneys for Countrywide and Countrywide employees and work product of Countrywide attorneys since the filing of this lawsuit concerning legal strategy and legal issues raised by the litigation.

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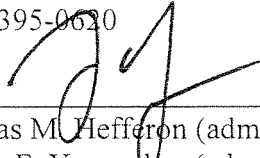
JERRY W. and GOLDA M. WASHINGTON,)	
individually and on behalf of all those)	
similarly situated,)	
)	
Plaintiffs,)	
)	
v.)	No. 08-00459-CV-W-FJG
)	
COUNTRYWIDE HOME LOANS, INC.,)	
)	
Defendant.)	
)	

DEFENDANT COUNTRYWIDE HOME LOANS, INC.'S AMENDED PRIVILEGE LOG

Defendant Countrywide Home Loans, Inc. ("Countrywide") submits this Amended Privilege Log with respect to Plaintiffs' First Set of Interrogatories and First Request for Production of Documents (the "Discovery"). Countrywide reserves all objections with respect to the Discovery and in providing this Privilege Log, Countrywide does not concede that any document logged is relevant to this litigation. This Privilege Log identifies privileged documents that Countrywide has located to date, and Countrywide reserves the right to supplement this Privilege Log if it locates additional responsive documents. If the Court orders production of any specific documents on the Privilege Log, Countrywide reserves the right to redact irrelevant material from such documents.

Countrywide has logged, as items 2 and 3, groups of general documents and communications protected by the attorney-client privilege and work product doctrine. It would be overly-burdensome for Countrywide to identify and log separately each such document and communication.

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Counsel for Defendant
Countrywide Home Loans, Inc.

Dated: February 11, 2009

	Document Date	Author	Recipient	Privilege	Description
1	Undated	Countrywide's Legal Department and Production Quality & Compliance Department		Attorney-client privilege	Communication regarding permissible fees for Missouri second mortgage loans
2				Attorney-client privilege Attorney work product	Numerous attorney client communications between attorneys for Countrywide and Countrywide employees and work product of Countrywide attorneys.
3				Attorney-client privilege Attorney work product	Numerous attorney client communications between attorneys for Countrywide and Countrywide employees and work product of Countrywide attorneys since the filing of this lawsuit concerning legal strategy and legal issues raised by the litigation.
4	Multiple dates	Data entered in Central Services Tracker file by various Countrywide employees		Attorney-client privilege	Four-page Central Services Tracker file. Redaction on one page reflects legal advice regarding permissible fees for Missouri second mortgage loans

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